

**REMARKS**

Claims **1-24** and **33-38** are pending in the application.

Claims **1-24** and **33-38** have been rejected.

Claims **37** and **38** have been amended.

**No claims** have been **cancelled** or **added**.

**Rejection of Claims under 35 U.S.C. §112**

Claims 1-24 and 33-38 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse this rejection.

As also noted in the Response to Final Office Action (filed on October 31, 2011) (“Previous Response”) support for the following claim amendments can be found throughout the present Patent Application and the Provisional Patent Application No. 60/457,271 filed March 24, 2003 (the “Provisional Application”) from which the current Application claims priority (as well as incorporates the Provisional Application by reference).

“wherein  
the converting the source inventory location information into the intermediate format comprises  
determining whether an intermediate record exists, wherein  
the intermediate record is associated with the source inventory location information,  
if the intermediate record exists, accessing a common object, wherein  
the common object is associated with the intermediate record,  
if the intermediate record does not exists, creating the intermediate record and the common object, and  
mapping the source inventory location information to the common object”

For example, support for the claim amendments can be found at least on pages 20 and 21 and Fig. 9 of the Provisional Application, as well as at other points in the present Patent Application, such Figs. 3A and 3B and their corresponding description, among others. Applicants respectfully observe that, while not mandated by the present situation, the current application can be amended to include at least the above-noted portions of the Provisional Application (e.g., by Applicants’ filing of a substitute Specification), as may be deemed desirable by the Examiner.

As such, independent claims 1, 9, and 33, and claims dependent thereon, comply with the written description requirement. In view of this, Applicants respectfully request that the rejection of claims 1-24 and 33-38 under 35 U.S.C. § 112 be reconsidered and withdrawn.

*Rejection of Claims under 35 U.S.C. § 103*

Claims 1-24 and 33-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U. S. Patent No. 5,446, 880 (“Balgeman”), and further in view of U.S. Patent Publication No. 2002/0178077 (“Katz”). Applicants respectfully traverse this rejection.

As an initial matter, Applicants hereby incorporate all discussions related to the patentability of pending claims 1-24 and 33-36 at least as presented in Applicants’ earlier-filed responses, including the Response to Final Office Action (filed on October 31, 2011) (“Previous Response”). Furthermore, Applicants respectfully note that the Office Action merely provides general allegations that Balgeman teaches or suggests multiple limitations of claim 1, but only cites various portions of Balgeman, without providing any guidance or explanation of how any features of Balgeman allegedly map (even if such mappings were somehow possible, which they are not) to various limitations of claim 1. Furthermore, Applicants submit that the same portions of Balgeman are cited against various dependent claims, such as claims 37 and 38, also without providing any guidance or explanation of how any features of Balgeman allegedly map (even if such mappings were somehow possible, which they are not) to various limitations of these dependent claims. As argued below, Applicants respectfully note that these deficiencies of the Office Action are probably necessitated by Balgeman’s obvious shortcomings.

Applicants respectfully submit that Coleman, Balgeman, and Katz, alone or in any rational combination, fail to teach or suggest the elements of claim 1, including:

generating intermediate source inventory location information by  
converting the source inventory location information into an  
intermediate format, wherein  
the converting the source inventory location information into the  
intermediate format comprises  
determining whether an intermediate record exists, wherein

the intermediate record is associated with the source inventory location information,  
if the intermediate record exists, accessing a common object, wherein the common object is associated with the intermediate record,  
if the intermediate record does not exist, creating the intermediate record and the common object, and mapping the source inventory location information to the common object, and  
after the converting, the common object comprises the intermediate source inventory location information

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54.

However, as argued in the Previous Response, insofar as Applicants are able to discern, Coleman does not teach or suggest any concepts comparable to converting source inventory location information into an intermediate format, particularly where such converting includes determining the existence of an intermediate record that is associated with the source inventory location information, among other limitations of the instant claims. This being the case, Coleman, must, by definition, also fail to teach or suggest, if such an intermediate record exists, accessing a common object, wherein the common object is associated with the intermediate record. In fact, Coleman does not teach or suggest the claimed intermediate record or the claimed common object, especially a common object that is associated with the intermediate record.

Coleman thus must also fail to teach or suggest, if such an intermediate record does not exist therein, creating the intermediate record and the common object, where the common object includes the source inventory location information in the intermediate format, all as recited in claim 1. Furthermore, Applicants also respectfully submit that Coleman does not teach or suggest mapping the source inventory location information to the common object, if for no other reason that such common object is not taught or suggested by Coleman. Coleman is also, correctly, not cited for any such elements of

claim 1. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

As also argued in the Previous Response, Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record by any node are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. The portions of Balgeman cited by the Office Action only state:

In accordance with the present invention, a user friendly communication system is provided in which all nodes in the system requiring access to a record maintains the record in a local database. Subsequent updates of the record by any node are automatically distributed to the other nodes by utilizing a standardized record format. Thus, the present invention provides an enhanced communication system allowing independent database flexibility while still providing the relevant nodes in the network with up-to-date records.

*Balgeman* at 8:51-60.

3. The system according to claim 1 further comprising means associated with said second node for automatically transmitting a copy of an updated first record based on the original record from said second database to the first database containing the corresponding original record, said first database storing said updated first record.

*Balgeman*, claim 3.

6. The node according to claim 5 further comprising means for automatically sending records stored in the first database that have been modified to other nodes which contain corresponding records thereby keeping corresponding records at other nodes updated.

*Balgeman*, claim 6.

7. The node according to claim 5 further comprising means for labeling each record at its creation with a unique identification number which always identifies all corresponding records in other nodes in the communication system.

*Balgeman*, claim 7.

9. The method according to claim 8 further comprising the step of automatically updating records stored in databases of other nodes upon a corresponding record being modified at one node in the communication system.

*Balgeman*, claim 9.

Applicants respectfully note that the Office Action merely provides general allegations that Balgeman teaches or suggests multiple limitations of claim 1, but only cites the above portions of Balgeman, without providing any guidance or explanation as to how any features of Balgeman might somehow be successfully mapped to any limitations of claim 1 or the various claims dependent thereon (even if such mappings were somehow possible, a point which Applicants do not concede). Applicants respectfully submit that the Office Action's aforementioned deficiencies are the result of Balgeman's shortcomings.

For example, Applicants respectfully submit that there is no feature of Balgeman that corresponds to the element of claim 1 of “determining whether an intermediate record exists.” Applicants respectfully submit that there is also no feature of Balgeman that corresponds to the claimed intermediate record, particularly where such an intermediate record is associated with the source inventory location information. Applicants also respectfully submit that there is also no feature of Balgeman that corresponds to the element of claim 1 of accessing a common object if any such intermediate record exists. Furthermore, Applicants respectfully submit that there is also no feature of Balgeman that corresponds to the claimed common object, particularly one which is associated with such an intermediate record. Applicants also respectfully submit that there is no feature of Balgeman that can be successfully equated with the claim creation of the intermediate record and the common object, if the intermediate record does not exist. Further still, Applicants respectfully submit that there is also no feature of Balgeman that corresponds to the claimed mapping of the source inventory location information to the common object.

As noted, the Office Action does not provide any support or guidance with regard to how any features of Balgeman (alone and/or combined with other cited references) allegedly teaches or even suggests any of these elements of claim 1, except for a general allegation that the above-quoted passages of Balgeman somehow discuss these elements. As noted, Applicants are not surprised by these deficiencies of the Office Action, since Balgeman simply does not teach or discuss any of these elements. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

Katz also fails to remedy these deficiencies. Insofar as Applicants are able to discern, Katz also fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. Katz, correctly, is also not cited for any such elements of claim 1. Applicants therefore respectfully submit that Katz, taken alone or in any rational combination with Coleman and/or Balgeman (which also fail to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and Katz does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and Katz cannot render claim 1 obvious. Furthermore, independent claims 9 and 33 are patentable over Coleman, Balgeman, and Katz for similar reasons to independent claim 1, and further in view of their own features. Still further, claims 2-8 and 35-38, which depends from independent claim 1, claims 10-24, which depend from independent claim 9, and claim 34, which depends from independent claim 33, are patentable over Coleman, Balgeman, and Katz for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 1-24 and 33-38 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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